

EXHIBIT 116

Highly Confidential - Subject to Further Confidentiality Review

REDACTED

Page 1

Highly Confidential - Subject to Further Confidentiality Review

<p style="text-align: center;">Page 206</p> <p>1 the form.</p> <p>2 THE WITNESS: Can you define 3 diversion for me, your definition of 4 diversion?</p> <p>5 QUESTIONS BY MR. MOUGEY:</p> <p>6 Q. You want me to define diversion 7 for you?</p> <p>8 A. Because it can mean so many 9 different things. That's why I'm asking.</p> <p>10 Q. Pills that are not ending up in 11 a legitimate home and out into the stream of 12 commerce. Did -- that pills were being 13 diverted from legitimate patients into the 14 hands of kids, that were being diverted into 15 the hands of drug dealers and making their 16 way into other states.</p> <p>17 MR. STOFFELMAYR: Objection to 18 the form.</p> <p>19 THE WITNESS: So are you asking 20 me if I was aware that that was 21 happening?</p> <p>22 QUESTIONS BY MR. MOUGEY:</p> <p>23 Q. Yes, sir.</p> <p>24 A. Yes, I was aware that people 25 were using opioid medications not for their</p>	<p style="text-align: center;">Page 208</p> <p>1 narcotics?</p> <p>2 MR. STOFFELMAYR: Objection to 3 the form.</p> <p>4 THE WITNESS: I personally did 5 not, no.</p> <p>6 QUESTIONS BY MR. MOUGEY:</p> <p>7 Q. You never went back and looked 8 prior to '13 what Walgreens was doing prior 9 to the agreed-upon creation of the 10 pharmaceutical integrity department?</p> <p>11 A. That was not part of my role, 12 so, no, I did not.</p> <p>13 Q. Did you ask anybody, Well, what 14 were we doing before the pharmaceutical 15 integrity department was created by agreement 16 between the DEA and Walgreens?</p> <p>17 A. I did not.</p> <p>18 Q. You never went back and looked 19 at the systems in place to avoid diversion 20 prior to you starting in the pharmaceutical 21 integrity department?</p> <p>22 MR. STOFFELMAYR: Objection to 23 the form.</p> <p>24 Go ahead.</p> <p>25 THE WITNESS: That was not part</p>
<p style="text-align: center;">Page 207</p> <p>1 intended use.</p> <p>2 Q. And not just for -- not just 3 for their intended use, but were you aware 4 that Florida was the epicenter of a notorious 5 well-documented epidemic of prescription drug 6 abuse, and those pills were migrating to 7 other states?</p> <p>8 A. I was made aware of that during 9 my time in pharmaceutical integrity.</p> <p>10 Q. So not until 2013?</p> <p>11 A. Correct.</p> <p>12 Q. And, sir, what were you told by 13 Walgreens about the migration of pills from 14 Florida pharmacies into other states?</p> <p>15 A. We were made aware of some of 16 the drug-seeking behavior of some of the 17 patients and how -- some of the techniques 18 that they use to obtain prescriptions not for 19 a legitimate medical purpose and made aware 20 of some prescribers that were not writing 21 prescriptions for legitimate medical purpose.</p> <p>22 Q. So at that point in time, in 23 2013, did you make a study or analyze the 24 systems set in place at Walgreens to minimize 25 or avoid the diversion of Schedule II and III</p>	<p style="text-align: center;">Page 209</p> <p>1 of my role, no.</p> <p>2 QUESTIONS BY MR. MOUGEY:</p> <p>3 Q. Have you ever looked through 4 this document that I have in front of you and 5 identified the discussion about the migration 6 of pills from Florida pharmacies to other 7 states?</p> <p>8 A. No.</p> <p>9 Q. Are you aware of how big a 10 problem it was in Florida that pills were 11 migrating from Florida pharmacies to other 12 states?</p> <p>13 A. I was not aware of the size of 14 the problem, no.</p> <p>15 Q. If you would, sir, please turn 16 to page 41, and it says, "Summary of 17 testimony." It's the Deputy Assistant 18 Administrator, Joseph Rannazzisi, says he's 19 from the DEA.</p> <p>20 Do you see that, sir?</p> <p>21 A. Yes.</p> <p>22 Q. And, sir, this is a submission 23 from the government's prehearing statement.</p> <p>24 Do you see that, sir?</p> <p>25 A. I do.</p>